

EXHIBIT 15

From: Gobena, Gejaa (CIV)
Sent: Friday, November 24, 2006 9:57 AM
To: 'christophercook@JonesDay.com'; Brooker, Renee (CIV); Draycott, Justin (CIV); jbreen@breenlaw.com; St.Peter-Griffith, Ann (USAFLS); Lavine, Mark (USAFLS); Martinez, Ana Maria (USAFLS)
Cc: tmtabacchi@JonesDay.com; dstorborg@JonesDay.com; jrdaly@JonesDay.com; jgwinchester@JonesDay.com
Subject: RE: Please see attached notices of depositions

Chris,

We are going to be cross-noticing a couple of depositions already noticed in the Texas case. Please confirm the following so we can issue the proper deposition notices:

1. Debra DeYoung is going to be deposed at Jones Day's Chicago office on 1/24/07
2. Gerald Eichorn is going to be deposed at Jones Day's Chicago office on 1/25/07

We need to reach agreement on a time keeping and use protocols for these depositions so there is no confusion in these kinds of cross-noticed depositions.

Also, we need a satisfactory, complete and unambiguous answer on whether you will be fully producing documents responsive to request #2 of the United States' first request for production, which calls for the production -- among other things -- of all documents produced in the Texas case against Abbott. Notwithstanding the fact that you have still not produced a crosswalk between your 26(a)(1) disclosures and your other (including Texas) productions, it is clear your initial disclosures to the United States omit evidence in this case that has been produced in other litigations. If the answer on 12/06/06 will be no, we need to meet and confer that day or on 12/7/06 so that we can take appropriate action as quickly as possible.

If the answer is yes you will be producing the documents produced to Texas, we expect the documents to be produced as they were to Texas, without the Texas bates numbers being electronically removed from the documents. We want the copies of those documents produced as is and not in any way electronically manipulated.

Thanks.

-----Original Message-----

From: christophercook@JonesDay.com [mailto:christophercook@JonesDay.com]
Sent: Wednesday, November 22, 2006 4:21 PM
To: Brooker, Renee (CIV); Draycott, Justin (CIV); Gobena, Gejaa (CIV); jbreen@breenlaw.com; St.Peter-Griffith, Ann (USAFLS); Lavine, Mark (USAFLS); Martinez, Ana Maria (USAFLS)
Cc: tmtabacchi@JonesDay.com; dstorborg@JonesDay.com; jrdaly@JonesDay.com; jgwinchester@JonesDay.com
Subject: Please see attached notices of depositions

(See attached file: 11.22.06 (Abbott) Abbott's Notice of 30(b)(6) Deposition of Plaintiff.pdf)

(See attached file: 11.22.06 (Abbott) Notice of Deposition of HHS Employee.pdf)

(See attached file: 11.22.06 (Abbott) Notice of Deposition of Nancy J. Molyneaux.pdf)